# EXHIBIT A

	United States I	DISTRICT COURT		SOUTH	ERN DIS	TRICT OF	TEXAS	
DETE				SOUTHERN DISTRICT OF TEXAS  HOUSTON DIVISION				
PETER BARBARA and JOHN DREW,								
versus Civil			CIVIL .	ACTION	No. 4:22	2-cv-003	340	
MCGRIFF INSURANCE SERVICES, INC.,			Г	DEFENI	DANT'S	EXHIB	BIT LIST	
	F: DEFENDANT						AND JOHN M.	
	OF HEARING: TRIA			JS (OGLI	ETREE D	EAKINS)		
JUDGE		CLERK:	REPOR	RTER:				
Andri	EW S. HANEN	RHONDA HAWKINS						
No.	DESCRIPTION			OFR	Овј	ADM	DATE	
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	000623-627)							
2.		to J. Drew answering que						
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3.	June 5, 2002	letter confirmation to J.	Drew,					
	· · · · · · · · · · · · · · · · · · ·	. 3; DREW 000658-664)	\					
4.	1	T. Duffy letters disc						
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		. 9; DREW 000590)						
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12.	Memorandum to T. Papadakis from J. Drew				
	regarding Producer Transitioning, July 23, 2008				
	(Drew Depo. Ex. 13; MCGRIFF10117-10118)				
13.	Letter to Steve Levene confirming offer of				
	employment, September 26, 2008				
1.4	(Drew Depo. Ex. 14; MCGRIFF10082-10084)				
14.	Bruce Dunbar email regarding Retention Tools,				
	March 12, 2010 (Drew Depo. Ex. 15; MCGRIFF10081)				
15.	T. Lambert email to J. Drew, et al., regarding				<u> </u>
13.	Promissory Note of J. Drew, April 18, 2016				
	(Drew Depo. Ex. 16; Bailey Depo Ex. 4;				
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16.	Summary of Accounts, December 31, 2008				
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17.	Email exchange with J. Drew regarding his				
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18.	J. Drew's Charge of Discrimination, September				
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19.	Determination and Notice of Rights, May 18,				
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20.	J. Drew's Answers and Objections to				
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21.	McGriff's historical Book Threshold				
	Forgivable Loans list				
	(Drew Depo. Ex. 23; Bailey Depo Ex. 14;				
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22.	Letter from B. Dunbar to T. Ebner and others				
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By: /s/ Gary D. Eisenstat

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OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

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(214) 987-3927 (Facsimile)

## ATTORNEYS FOR DEFENDANT

# **CERTIFICATE OF SERVICE**

I hereby certify that on December 27, 2023, the foregoing document was filed using the Court's electronic filing system, which will send notification of such filing to all counsel of record.

/s/ Gary D. Eisenstat

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MCGRIFF INSURANCE SERVICES, INC.,			DEFENDANT'S EXHIBIT LIST					
LIST OF: DEFENDANT			COUNSEL: GARY D. EISENSTAT AND JOHN M.					
TYPE OF HEARING: TRIAL			BARCUS (OGLETREE DEAKINS)					
JUDGE: CLERK:			REPOR	RTER:				
ANDR	ANDREW S. HANEN RHONDA HAWKINS							
No.	DESCRIPTION			OFR	OBJ	ADM	Date	
1.	McGriff's Offer 2002	letter to J. Drew, Februa	ary 18,					
	(Drew Depo. Ex. 1; Bailey Depo Ex. 1; I 000623-627)							
2.	McGriff's letter to J. Drew answering questions relative to the equity part of his deal, May 2, 2002							
	` I	. 2; DREW 000620-621)						
3.	McGriff's Offer letter confirmation to J. Drew,							
	June 5, 2002							
	(Drew Depo. Ex. 3; DREW 000658-664)							
4.	I. Stern and T. Duffy letters discussing							
	discharge language for employment agr		ement,					
	June 25, 2002 and June 26, 2002							
5.	(Drew Depo. Ex. 4; DREW 000665-668)  I. Stern and T. Duffy letter discussing discharge							
].	language for employment agreement with							
		sions on June 25, 2002						
	(Drew Depo. Ex. 5; DREW 000676)							
6.								
	discharge language for employment agreemen							
	with handwritten revisions on June 26, 2002							
		. 6; DREW 000672)						
7.		to P. Burleson sendir	ng the					
	employment agreement, July 18, 2002							
	1	. 8; DREW 000589)						
8.	I. Stern letter to P. Burleson to confirm joint							
	defense agreement, July 18, 2002							
0		. 9; DREW 000590)	ffor of			<del>                                    </del>		
9.		J. Drew confirming of	ner oi					
	employment, August 2, 2002 (Drew Depo. Ex. 10; MCGRIFF 000259-268		268)					
Ш	II (Diew Depo. Ex.	. 10, MCGRITT 000239	-200)		<u> </u>	II II		

No.	DESCRIPTION	OFR	Овј	ADM	DATE
10.	J. Drew's Employment Agreement, signed,				
	August 2, 2002				
	(Drew Depo. Ex. 11; Bailey Depo Ex. 2)				
11.	Producer Remuneration Plan, January 1, 2002				
	(Drew Depo. Ex. 12; DREW 000628-655)				
12.	Memorandum to T. Papadakis from J. Drew				
	regarding Producer Transitioning, July 23, 2008				
	(Drew Depo. Ex. 13; MCGRIFF10117-10118)				
13.	Letter to Steve Levene confirming offer of				
	employment, September 26, 2008				
	(Drew Depo. Ex. 14; MCGRIFF10082-10084)				
14.	Bruce Dunbar email regarding Retention Tools,				
	March 12, 2010				
	(Drew Depo. Ex. 15; MCGRIFF10081)				
15.	T. Lambert email to J. Drew, et al., regarding				
	Promissory Note of J. Drew, April 18, 2016				
	(Drew Depo. Ex. 16; Bailey Depo Ex. 4;				
1.6	MCGRIFF 001930-1934)				
16.	Summary of Accounts, December 31, 2008				
17.	(Drew Depo. Ex. 17; DREW 000080)				
1 /.	Email exchange with J. Drew regarding his payment of taxes on his stock compensation,				
	January 7 through January 30, 2003				
	(Drew Depo. Ex. 18; DREW 000691)				
18.	J. Drew's Charge of Discrimination, September				
10.	9, 2021				
	(Drew Depo. Ex. 19; Bailey Depo Ex. 10)				
19.	Determination and Notice of Rights, May 18,				
	2022				
	(Drew Depo. Ex. 20; DREW 000003-6)				
20.	J. Drew's Answers and Objections to				
	Defendant's Second Set of Interrogatories,				
	September 5, 2023				
	(Drew Depo. Ex. 21)				
21.	McGriff's historical Book Threshold				
	Forgivable Loans list				
	(Drew Depo. Ex. 23; Bailey Depo Ex. 14;				
	MCGRIFF 000322-332)				
22.	Letter from B. Dunbar to T. Ebner and others				
	regarding producer retention, February 8, 2008				
	(Hodo Depo. Ex. 3; MCGRIFF 000001-				
	000003)				

23.	McGriff (historical MSW) Book Threshold			
	Forgivable Loans Issued			
	(Hodo Depo. Ex. 6; MCGRIFF 000322-000332)			
24.	Producer Retention Loans			
	(Hodo Depo. Ex. 7; MCGRIFF 10090-10092)			
25.	J. Drew's Employment Agreement, August 2,			
	2002			
	(Hodo Depo. Ex. 9; MCGRIFF 000004-000009)			
26.	Letter from B. Dunbar to J. Drew regarding			
	traditional and retention compensation, April			
	24, 2008			
27	(Hodo Depo. Ex. 10; DREW 000728-000730)			
27.	Memo from B. Dunbar to T. Ebner and others regarding retention tools, March 12, 2010			
	(Hodo Depo Ex. 11; MCGRIFF 10079)			
28.	Email from J. Drew to D. Hodo regarding not			
	being treated fairly on the forgivable loan area			
	and other topics, March 31, 2015			
20	(Hodo Depo. Ex. 12; DREW 000727)			
29.	Email from T. Lambert to T. Ebner regarding J.			
	Drew's compensation benefits, December 23, 2015			
	(Hodo Depo. Ex. 14; MCGRIFF 001962-			
	001963)			
30.	Email from T. Lambert to J. Drew and others			
	regarding J. Drew receiving a retention loan,			
	April 18, 2016			
	(Hodo Depo. Ex. 15; MCGRIFF 001930-001934)			
31.	Memo to T. Ebner, et al from B. Dunbar			
	regarding Producer Retention, February 8, 2008			
	(Bailey Depo. Ex. 3; MCGRIFF 000001-3)			
32.	J. Vanloock email to R. Ulmer regarding			
	Promissory Notes – history on certain unique scenarios, March 4, 2021			
	(Bailey Depo. Ex. 5; MCGRIFF000247-249)			
33.	J. Drew's Supplemental Answers to McGriff's			
	Second Set of Interrogatories (Dec. 5, 2023)			
34.	Truist Equal Employment Opportunity and			
	Anti-Harassment Policy (MCGRIFF 1949-			
25	MaChiff Sighala & Williams Inc. Drawaged			
35.	McGriff, Siebels & Williams, Inc. Proposed 2016 Loans to be made (MCGRIFF 10114-			
	10115)			
u	<u> </u>	u		<u> </u>

36.	Retention Loans 2013-2018 (MCGRIFF 10093)		
37.	Producer Loan Program – Proposed 2014 Loans to be made Based on 2013 Production (MCGRIFF 10042)		
38.	Producer Loan Program – Proposed 2018 Loans to be made Based on 2017 Production (MCGRIFF 10043-10045)		
39.	Memo re 2004 Stock Option Grant (DREW 554-562)		
40.	Memo re 2004 Stock Incentive Plan (DREW 599-607)		
41.	Memo re Restricted Stock Unite Agreement (DREW 484-491)		
42.	Memo re 2009 Equity Award (DREW 572)		
43.	Memo re Amendments to 2006, 2007, and 2008 RSU Agreements and Stock Plan Amendments (DREW 532)		
44.	Restricted Stock Unit Agreement (Grant Date February 24, 2009) (DREW 512-520)		
45.	Memo re 2006 Equity Award (DRDW 472)		
46.	Memo re 2004 Stock Incentive Plan (DREW 492-498)		
47.	Enterprise Retention Schedule (MCGRIFF 1867-1924)		
48.	Drew Final Pay Statement for 2023		
49.	Accounting Workpapers Reflecting Manual Adjustment to Drew's Sales Credits from 2005-present upon which his annual salary has been based.		

By: /s/ Gary D. Eisenstat

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## ATTORNEYS FOR DEFENDANT

# **CERTIFICATE OF SERVICE**

I hereby certify that on December 27, 2023, the foregoing document was filed using the Court's electronic filing system, which will send notification of such filing to all counsel of record.

/s/ Gary D. Eisenstat